

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA)	CAUSE NO. 2:21 CR 98
)	
v.)	18 U.S.C. § 1962(d)
)	18 U.S.C. § 1958(a)
RONNIE ERVIN MAJOR a/k/a "Black";)	21 U.S.C. § 841(a)(1)
ANTOINE JERMELL GATES a/k/a)	21 U.S.C. § 846
"Twan";)	18 U.S.C. § 922(g)(1)
KENNETH CHRISTOPHER MCGHEE)	18 U.S.C. § 924(c) and (j)
a/k/a "Sonny," "Angel";)	18 U.S.C. § 2
MICHAEL CASTRO RIVERA a/k/a)	
"Puerto Rican Mike";)	
DOUGLAS SHERMAN BLOWERS a/k/a)	
"Proffit";)	
DANIEL RICHARD SPANLEY a/k/a)	
"Tattoo";)	
ROGER LEE ERVIN BURTON a/k/a)	
"Bo";)	
JAMES ULRICH RICHARDSON a/k/a)	
"Little Rick";)	
RICHARD WHITE a/k/a "Ignorant)	
"Bastard";)	
BRANDON ROMAND PARKS a/k/a)	
"Baywatch";)	
HERMAN TROY JEFFERSON a/k/a)	
"G-Rilla";)	
DAVID LAGRANT GUY a/k/a "Fly Guy";)	
JESSIE DONALD WILLIS a/k/a "Chip";)	
MARVIE D. GARDNER a/k/a)	
"Widowmaker";)	

-FILED-
OCT 21 2021
At GARY T. BELL, Clerk M
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

BERNARD SMITH a/k/a "Flirt,")
"Preacher";)
GREGORY PATRICK WELDON a/k/a)
"Sugar Bear")

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
(RICO Conspiracy)

Introduction

1. At various times relevant to this Superseding Indictment, the following defendants, and others known and unknown, were members and associates of the "SIN CITY DECIPLES" Outlaw Motorcycle Gang, a criminal organization whose members and associates engaged in acts of violence, acts involving murder, aggravated battery, aggravated assault, as well as acts involving extortion, trafficking in stolen property, obstruction of justice, sex trafficking, firearms violations, and narcotics distribution, and which operated in the Northwest Indiana area, the Northern District of Indiana, Hammond Division, and elsewhere: **RONNIE ERVIN MAJOR a/k/a "Black," ANTOINE JERMELL GATES a/k/a "Twan," KENNETH CHRISTOPHER MCGHEE a/k/a "Sonny," "Angel," MICHAEL CASTRO RIVERA a/k/a "Puerto Rican Mike," DOUGLAS SHERMAN**

BLOWERS a/k/a "Proffit," DANIEL RICHARD SPANLEY a/k/a "Tattoo," ROGER LEE ERVIN BURTON a/k/a "Bo," JAMES ULRICH RICHARDSON a/k/a "Little Rick," RICHARD WHITE a/k/a "Ignorant Bastard," BRANDON ROMAND PARKS a/k/a "Baywatch," HERMAN TROY JEFFERSON a/ka "G-Rilla," DAVID LAGRANT GUY a/k/a "Fly Guy," JESSIE DONALD WILLIS a/k/a "Chip," MARVIE D. GARDNER a/k/a "Widowmaker," and BERNARD SMITH a/k/a "Flirt," "Preacher."

General Background and Structure of the Enterprise

2. The SIN CITY DECIPLES [hereinafter referred to as SCD] was an "outlaw" motorcycle organization formed in Gary, Indiana, in 1967. The organization was initially formed by a group of African-American or mixed-race motorcyclists who were prohibited from joining any of the then-existing all white Outlaw Motorcycle Gangs [hereinafter referred to as "OMG's"].

3. The SCD self-identify, and are thought of by other motorcyclists, as a 1%, or outlaw, Motorcycle Gang. The "1%" designation is in response to a proclamation issued in the 1940s by the American Motorcycle Association that ninety-nine percent of persons in motorcycle clubs were law-abiding citizens. The "1%" designation signifies that the SCD members were in the other 1%, that is, they were not law-abiding citizens.

4. The SCD has a highly structured organization. This structure exists at the local chapter level, the regional level, and the national level. At the chapter level, each chapter has a President, who is the most powerful individual within the chapter. The chapter President is responsible for making decisions about all important club issues. The next officer in line is the Vice President, who serves as a second in command. Chapter dues and finances are handled by the Treasurer. Each chapter also has a Secretary, who keeps minutes of the meetings and is in charge of documenting club membership and other information. In addition, each chapter has one or more Enforcers, who are responsible for enforcing club rules and meting out punishment, as directed by the chapter President.

5. Each chapter is part of a specific region, and each region has a set of regional officers. There is a position simply called "The Regional," which is the functional equivalent of a Regional President. There are also Regional Enforcers.

6. The SCD national structure for the most part mirrors that of the local chapters. The highest-ranking national officer is the National President. Directly under him is a National Vice President, National Treasurer, National Secretary, Business Manager, and National Enforcers.

In addition, there is a National Board of Advisors. These are responsible for counseling and advising the gang leadership. The enterprise was operated through a strict chain of command on the chapter, regional, and national levels.

7. Associates and members followed a written code of conduct. This written code of conduct, organizational structure, and set of rules and procedures was outlined in what is now in the form of a PowerPoint presentation entitled "SOP" ("The Law"), which was distributed to members throughout the enterprise. The SOP covers a wide range of rules and regulations and outlines the structure of the organization. Rules include that SCD members ride Harley-Davidson motorcycles. A member can get a SCD tattoo after five years, or a shorter period of time based on merit. SCD members must respect his brothers, sisters, and officers. Members need to have knowledge regarding the founders of SCD. Members must wear their club cuts or colors at all club events. Attendance at all National Runs is mandatory. Violations of the code resulted in fines, probation, expulsion, a new prospecting period, or acts of violence against the violator.

8. SCD leaders had the authority within the organization to issue direct orders and mete out punishment. A direct order was an assignment

given to a subordinate SCD member that would serve a purpose for the SCD. The direct order could range from a leader ordering a “S.O.S.” (smash on sight), meaning the assault of a rival gang member or of a SCD member who had committed a violation of the SCD rules, to a “green light,” meaning the murder of a rival gang member or of a SCD member who had committed an egregious violation of the gang’s rules. Failure to perform a direct order resulted in the assigned member being in violation of the rules. Punishment for failing to complete a direct order could range anywhere from a beating to death.

9. SCD are “patched” as a formal method of identifying themselves and their level of participation in the Outlaw Motorcycle Club [hereinafter referred to as “OMC”]. The vestments denoting membership in the OMC, referred to as “cuts” or “colors,” include a black leather vest with a back patch depicting the club emblem, and a man riding a motorcycle book-ended by the letters M and C. This emblem is surrounded by patches called a top “rocker” bearing the words SIN CITY and a bottom “rocker” bearing the word DECIPLES. Members who wore their SCD “colors” did so with the authority of the SCD. Members were required to wear their “colors” when riding their motorcycles and when attending a national run or SCD events. SCD

members wore shirts, hats, bandannas, and other articles of clothing in the same colors to show their affiliation with SCD. The vests also displayed other symbols including a “1%er” in a diamond, DFFD in a rectangle, patches that signify positions in the hierarchy and “In Memory” patches to recognize deceased members. The DFFD patch stands for “Deciples Forever Forever Deciples.”

10. There is a strict and well-defined procedure for joining the SCDs. There was a lengthy process before one could become a “full patched” member. This process was designed to guard in part against law enforcement infiltration into the enterprise. First, the prospective member was allowed to associate with enterprise members. During this time the prospective member was identified as a “hangaround.” The next phase was that the person became a “probate” which required being sponsored by a full patched member. During this phase, probates were expected to assist the SCD with all of its activities, including those activities that were criminal in nature. Probates must attend all runs, maintain the clubhouse, obey all patched members, set up and clean at all parties, and find someone to replace themselves as a probate once becoming a full patched member. SCD probates were required to wear cuts. The lack of a center patch on these cuts indicated

that the individual is a probate and not a full patched member. In order for a probate to become a member, a vote was taken, and a probate had to have 100% support from his SCD chapter membership.

11. SCD full patched members were, at some point either before or after receiving their full patch, identified by a “club name” or nickname for the express purpose of concealing their true identity and thwarting identification by law enforcement. SCD nicknames are used by SCD members in letters, emails, and club communications.

12. SCD members, prospects, and members of support clubs were required to pay dues on a monthly basis. A portion of these dues were forwarded to the national leadership. “Taxes” were assessed on individual members at various times, with the proceeds also being funneled up the SCD chain to the national leadership. The dues and taxes helped fund the continued operation of the enterprise and were used for a variety of purposes, including the payment of expenses to the national leadership, covering funeral expenses of members, contributing to a legal defense fund for members, and paying costs associated with planned trips or “runs.” The enterprise also raised funds for its activities and to pay the legal defense fees for charged members through unlawful gambling activities, such as raffles.

13. Members enforced their authority through direct attacks against rival motorcycle gangs, as well as members of the general public who came in contact with the SCD in a manner, whether intentionally or unintentionally, deemed “disrespectful” by the organization. SCD members travelled often to areas claimed by rival gang members in order to provoke confrontation. Rival gang members were often forced to surrender their “cuts” and “colors” or faced beatings or death.

14. Each chapter of the SCD had a number of “support clubs” in their geographical region which they oversaw. A support club for the SCD was a motorcycle club that supports the SCD through attending various functions, taking orders from SCD, and providing security for the SCD for SCD members and events. The SCD often recruited new prospects from these various support clubs. The members of the support clubs were required to pay a monthly fee to the SCD. This money personally enriched SCD leadership, and also was used in furtherance of SCD’s activities. In Indiana, the support clubs of the SCD included but were not limited to the Mayhem Motorcycle Club, the Rough Riders Motorcycle Club, 3D Riders, 219 Family, and Chosen Few Motorcycle Club.

15. SCD members would regularly approach motorcycle clubs and tell them that they must become support clubs, buy support club patches, and pay monthly dues to the SCD. Clubs that refused to do so had their clubs burned down or shot up, and their members beaten or shot. SCD members, once they shut down a club that refused to "patch over," then took a set of the shutdown club's cuts and hung them upside down in the SCD clubhouse as a trophy.

16. The Gary chapter of the SCD, which was referred to as the "mother chapter," utilized a clubhouse located at 1301 Virginia Street, Gary, Indiana.

17. In 2006, **KENNETH CHRISTOPHER McGHEE** established the SIN CITY TITANS [hereinafter referred to as, "SCT") in order to bring individuals into the enterprise who wanted to join the SCD but rode foreign-made motorcycles, usually Japanese-made sport bikes, instead of Harley-Davidsons. The SCT were created to be equal in status to the SCD. The SCT and SCD were controlled by the same leadership, and both utilized the same clubhouses. **McGHEE** was able to make the organization more appealing to younger motorcycle riders and a wider recruiting base, thereby generating more income for **McGHEE** and the SCD.

18. The SCD maintained an inventory of firearms, including handguns, shotguns, and semi-automatic assault rifles, in order to enforce its authority and intimidate rival gangs. Such weapons were often stolen in an attempt to conceal their connection to the SCD.

19. There are no female members of the SCD. Some females who associated with the SCD and engaged in criminal activity for the benefit of the SCD were referred to as the “property” of SCD members. Associates who did not fulfill their obligation to the SCD were sometimes subjected to violence, including murder. Female associates were frequently called upon to carry narcotics and/or firearms for members of the gang.

20. In addition to females who were considered the “property of” SCD members, there existed a group of female close associates of the SCD who were SIN CITY ANGELS [hereinafter referred to as “SCA”]. SCA were not “property of” the SCD, but instead were afforded the full rights and benefits as the full patched members of the SCD. The SCA were established by **KENNETH CHRISTOPHER McGHEE** in 2010. SCA share the same Mother Chapter in Gary, Indiana with the SCD. SCA has approximately 10 chapters nation-wide with each chapter having a similar governing body as SCD. SCA pay dues at the chapter level as well as the national level and

SCA members are allowed to ride any type of motorcycle. SCA were also subject to being disciplined and paying fines.

The Racketeering Enterprise

21. The SIN CITY DECIPLES, including its leadership, membership, and associates, constituted an enterprise as defined in 18 U.S.C. § 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members, prospects, and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

22. The purposes of the enterprise included, but were not limited to, the following:

- a. Enriching the leaders, members, and associates of the enterprise through, among other things, interstate transportation of stolen goods, and illegal trafficking of controlled substances and firearms, often in interstate and foreign commerce.
- b. Preserving, protecting, and enhancing the power, territory,

reputation, and profits of the enterprise through the use of threats, intimidation, violence, and destruction including, but not limited to, acts involving murder, assault, extortion, obstruction of justice, and other acts of violence.

c. Promoting and enhancing the enterprise and its members' and associates' activities.

d. Keeping victims in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence.

e. Providing financial support to gang members who were charged with or incarcerated for gang-related activities.

f. Hampering law enforcement's ability to effectively investigate the enterprise's unlawful conduct through the obstruction of justice.

Means and Methods of the Enterprise

23. The means and methods by which the leaders, members, and associates conducted and participated in the conduct of the affairs of the SIN CITY DECIPLES criminal enterprise included the following:

- a. The leaders of the enterprise directed, sanctioned, approved, and permitted other members and associates of the enterprise to carry out acts in furtherance of the enterprise.
- b. Members of the enterprise and their associates committed, conspired to commit, attempted to commit, and threatened to commit acts of violence, including murder, kidnapping, robbery, assault, intimidation, and extortion to protect the enterprise's power, territory, and property.
- c. To generate income, SCD members and associates engaged in illegal activities under the protection of the enterprise, including narcotics trafficking, weapons trafficking, and other illegal activities.
- d. For protection, attacks, and armed combat, SCD members and associates acquired, carried, and used firearms.
- e. Members and associates of the enterprise employed and used gang-related terminology, symbols, phrases, and gestures to demonstrate affiliation with the gang.
- f. To perpetuate the enterprise and to maintain and extend their power, members and associates of the enterprise committed, attempted to commit, and conspired to commit acts including murder, attempted murder, intimidation, and assault against individuals who posed a threat to the

enterprise or jeopardized its operations, including rival motorcycle organizations, SCD members, and witnesses to illegal activities of the enterprise.

g. Members and associates of the enterprise talked in code when communicating over the telephone to avoid law enforcement detection, and communication in person was always preferable.

h. Members of the enterprise and their associates were forbidden from cooperating with law enforcement. Attorney's fees were paid for by the enterprise when members and associates were arrested for gang-related crimes to help ensure silence was maintained. Legal paperwork was reviewed for signs of cooperation.

The Racketeering Conspiracy

24. Beginning on a date unknown to the Grand Jury, but at least as of in or about 2009, and continuing through on or about the date of this Superseding Indictment, in the Northern District of Indiana and elsewhere, the defendants,

**RONNIE ERVIN MAJOR a/k/a "Black,"
ANTOINE JERMELL GATES a/k/a "Twan,"
KENNETH CHRISTOPHER MCGHEE a/k/a "Sonny," "Angel,"
MICHAEL CASTRO RIVERA a/k/a "Puerto Rican Mike,"**

**DOUGLAS SHERMAN BLOWERS a/k/a "Proffit,"
DANIEL RICHARD SPANLEY a/k/a "Tattoo,"
ROGER LEE ERVIN BURTON a/k/a "Bo,"
JAMES ULRICH RICHARDSON a/k/a "Little Rick,"
RICHARD WHITE a/k/a "Ignorant Bastard" "I.B.,"
BRANDON ROMAND PARKS a/k/a "Baywatch,"
HERMAN TROY JEFFERSON a/k/a "G-Rilla,"
DAVID LAGRANT GUY a/k/a "Fly Guy"
JESSIE DONALD WILLIS a/k/a "Chip,"
MARVIE D. GARDNER a/k/a "Widowmaker,"
and
BERNARD SMITH a/k/a "Flirt," "Preacher,"**

each being a person employed by and associated with the SIN CITY
DECIPLES, an enterprise engaged in, and the activities of which affected,
interstate and foreign commerce, together with others known and unknown
to the Grand Jury, did knowingly and intentionally conspire to conduct and
participate, directly and indirectly, in the conduct of the affairs of the
enterprise through a pattern of racketeering activity, as defined in Sections
1961(1) and (5) of Title 18, United States Code, consisting of:

a.) multiple acts involving:

1. murder in violation of Indiana Code 35-42-1-1, 35-41-2-4, 35-
41-5-1, 35-41-5-2, and in violation of Title 18, Pennsylvania
Consolidated Statute, Sections 2502, 901 and 903;
2. robbery in violation of Indiana Code 35-42-5-1, 35-41-2-4, 35-
41-5-1, and 35-41-5-2;

3. extortion, in violation of Indiana Code 35-45-2-1(a)(1), 35-45-2-1(b)(1)(A), and 35-45-2-1(b)(2)(A), 35-41-2-4, 35-41-5-1, and 35-41-5-2;
4. kidnapping, in violation of Indiana Code 35-42-3-2, 35-41-2-4, 35-41-5-1, and 35-41-5-2;

b.) multiple acts indictable under:

1. Title 18 United States Code Section 1951 (Hobbs Act Robbery);
2. Title 18 United States Code Section 1952 (interstate travel in aid of racketeering);
3. Title 18 United States Code Section 2312 and 2313 (relating to interstate transportation of stolen motor vehicles);

c.) multiple offenses of federal narcotics trafficking statutes under:

1. Title 21, United States Code, Section 841(a)(1) (distribution and possession with intent to distribute a controlled substance);
2. Title 21, United States Code, Section 843(b) (communication facility); and,

3. Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute a controlled substance).

It was part of this conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

Overt Acts

25. In furtherance of the conspiracy and to achieve the object thereof, the defendants and others performed or caused to be performed the following overt acts, among others, in the Northern District of Indiana and elsewhere

a. In approximately 2009, **KENNETH CHRISTOPHER McGHEE** met with **MICHAEL CASTRO RIVERA**, **RONNIE ERVIN MAJOR** and **ANTOINE JERMELL GATES** to discuss establishing the Ruff Ryders MC as the SCD sister club, the SIN CITY TITANS. **McGHEE** decreed that members of the SCT would have all of the rights and benefits of the members of the SCD, but would be allowed to ride motorcycles that were not made by Harley-Davidson. **McGHEE** offered **ANTOINE JERMELL GATES** the position of president of the SCT.

b. On multiple occasions during the course of the conspiracy **RONNIE**

ERVIN MAJOR utilized his towing company, Affordable Towing, as a “chop shop” for members of the SCD to dismantle and resell stolen motorcycles and automobiles.

c. On multiple occasions during the course of the conspiracy **RONNIE ERVIN MAJOR** loaned members of the SCT, SCD, and others individuals’ automobiles which had been towed by Affordable Towing to be used during robberies and shootings. The individuals whose cars had been towed had no knowledge that their cars were being used as getaway cars for robberies and shootings.

d. On an unknown date in approximately 2010, **RONNIE ERVIN MAJOR** paid **ANTOINE JERMELL GATES** and another individual to burn the black Chevrolet pickup truck of a SCD member who owed **MAJOR** money.

e. On an unknown date in approximately 2010, **RONNIE ERVIN MAJOR** sent **ANTOINE JERMELL GATES** and four other individuals to steal motorcycles from a dealership in Merrillville, Indiana.

f. On an unknown date in approximately May or June, 2010, **RONNIE ERVIN MAJOR** sent **ANTOINE JERMELL GATES**, SUBJECT 1, SUBJECT 2 and SUBJECT 3 to rob a currency exchange business in Gary,

Indiana. **MAJOR** instructed them as to where an employee of the currency exchange lived, and the four individuals broke into her house and kidnapped her in front of her children, transported her against her will, and made her let them in to the currency exchange business where they stole money.

g. On December 9, 2010, **RONNIE ERVIN MAJOR** and **ANTOINE JERMELL GATES** killed Jocelyn Blair in order to prevent her from testifying against **MAJOR** in an upcoming trial. **MAJOR** hired **GATES** and others to commit this homicide and compensated them financially for it.

h. On an unknown date in approximately 2010 or 2011, **RONNIE ERVIN MAJOR** hired **ANTOINE JERMELL GATES** to burn up the truck of an individual. Gates enlisted the assistance of SUBJECT 2 and they located and burned the victim's Chevrolet truck in the parking lot of the Small Farms Apartments in Gary, Indiana.

i. In July 2014, **KENNETH CHRISTOPHER MCGHEE** and **MICHAEL CASTRO RIVERA** shot SIN CITY DECIPLE 1, in East St. Louis, Illinois, over a dispute regarding money and the taking of SIN CITY DECIPLE 1's cuts.

j. In or about April, 2015, **KENNETH CHRISTOPHER McGHEE** and **ROGER LEE ERVIN BURTON** decided to revoke the membership of

SCD full patched member London Clayton a/k/a "Short Dog."

k. On May 1, 2015, **ROGER LEE ERVIN BURTON** attempted to seize the colors of London Clayton. Clayton and **BURTON** began to fight. During the course of this fight, which **MICHAEL CASTRO RIVERA** joined, **BURTON** was shot, and Clayton was shot and killed.

l. On October 11, 2015, **MICHAEL CASTRO RIVERA** told **KENNETH CHRISTOPHER McGHEE** that **DAVID LAGRANT GUY** was not present for **RIVERA**'s recent court hearing on the Clayton homicide. **RIVERA** informed **McGHEE** that **GUY** was in the parking lot, put the vehicle in park, and may be the only witness for the State.

m. On January 1, 2016, **KENNETH CHRISTOPHER McGHEE** told **MICHAEL CASTRO RIVERA** that other SCD members were trying to take **RIVERA**'s leadership position in the SCD.

n. On January 13, 2016, **KENNETH CHRISTOPHER McGHEE** told **MICHAEL CASTRO RIVERA**, who was incarcerated in Lake County Jail, that **RIVERA** was still the National President of the SCD. **McGHEE** further told **RIVERA** that he intends to "shake things up" at the upcoming national meeting of the SCD.

o. On a January 26, 2016, recorded jail call, **KENNETH**

CHRISTOPHER MCGHEE told **MICHAEL CASTRO RIVERA** that at the recent National Meeting he told everybody that this is not a democracy, it is a dictatorship. **McGHEE** further stated that when people tried to interrupt **McGHEE** at the meeting, **BRANDON ROMAND PARKS** threatened to beat them up and throw them out.

p. On February 6, 2016, **KENNETH CHRISTOPHER McGHEE** told **MICHAEL CASTRO RIVERA** on a recorded jail call that he was talking to a new club about “patching” over to become SCD. **RIVERA** told **McGHEE** to remember to tell them that this is a dictatorship.

q. On October 26, 2016, **KENNETH CHRISTOPHER McGHEE** told **MICHAEL CASTRO RIVERA**, in a recorded jail call, that **RIVERA** was the National President of SCD, and **BRANDON ROMAND PARKS** was the Chief of Staff.

r. On October 27, 2016, members of the SCD committed an arson on the clubhouse of the rival Cobras MC, located at 800 East 5th Street, Gary, Indiana.

s. On March 1, 2017, **KENNETH CHRISTOPHER McGHEE** told **MICHAEL CASTRO RIVERA**, who was incarcerated, that he had shut down the Brotherhood Motorcycle Club, because they had refused to buy him

(McGHEE) a garage door opener. McGHEE expressed his displeasure with the Brotherhood Motorcycle Club for not showing loyalty to the SCD, who had helped them with their conflict with the Invaders Motorcycle Club.

t. On January 9, 2018, **KENNETH CHRISTOPHER McGHEE** told **MICHAEL CASTRO RIVERA** that he had told his wife that should something happen to **McGHEE, RIVERA** will take over the SCD, regardless of whether **RIVERA** is still incarcerated.

u. On April 1, 2018, the SCD “patched over” **DOUGLAS SHERMAN BLOWERS, DANIEL RICHARD SPANLEY**, and other members of the Mayhem Motorcycle Club. These patched members of the Mayhem Motorcycle Club became patched members of the SCD, with all of the privileges and benefits of other members.

v. After being “patched over,” **DOUGLAS SHERMAN BLOWERS**, who had founded the Mayhem Motorcycle Club, became the President of the Lake Station, Indiana SCD chapter.

w. On October 16, 2018, **DOUGLAS SHERMAN BLOWERS** threatened the Chief of the New Chicago, Indiana, Police Department over a club member’s motorcycle being towed.

x. On December 9, 2018, **KENNETH CHRISTOPHER MCGHEE**

ordered the beating of SIN CITY DECIPLE 2, after a SCA had wrongfully accused him of raping her. Acting at **McGHEE**'s direction, **DOUGLAS SHERMAN BLOWERS, RICHARD WHITE, DANIEL RICHARD SPANLEY, DAVID LAGRANT GUY, JAMES ULRICH RICHARDSON**, and other members of the SCD beat SIN CITY DECIPLE 2, including but not limited to sexually assaulting him with a pole, causing internal injuries.

y. On an unknown date during the course of the conspiracy **KENNETH CHRISTOPHER McGHEE** traveled to Phoenix, Arizona, to preside over a meeting. During the course of this trip, **McGHEE** instructed Phoenix SCD members to commit violence against the rival Wheels of Soul OMG, because the Wheels of Soul members took issue with the Phoenix SCD taking over the all-female Sins of Sheba as a support club.

z. Sometime in early 2019, **DOUGLAS SHERMAN BLOWERS** became President of the Gary Chapter of SCD.

aa. On May 20, 2019, SCD members fought and beat up members of the 219 Motorcycle Club for disrespecting SCD members earlier in the day.

bb. On July 8, 2019, **DANIEL RICHARD SPANLEY** and Gregory Patrick Weldon, acting at the direction of **KENNETH CHRISTOPHER McGHEE**, drove with cocaine from Northwest Indiana to the SCD clubhouse

in Louisville, Kentucky, where they sold approximately 280 grams of cocaine to an FBI informant, who was a full patched member of the SCD.

cc. On July 31, 2019, **RICHARD WHITE** shot VICTIM 1, who he believed to be a member of the rival Royal Flush MC, in the leg, in Pittsburgh, Pennsylvania.

dd. On August 9, 2019, **RICHARD WHITE** shot VICTIM 2, who he believed to be a member of the rival Outcast MC, multiple times, severely injuring him, in Pittsburgh, Pennsylvania.

ee. After SCD member Curtiss Meeks a/k/a “Chickenhawk” was killed on August 13, 2019, in Penn Hills, Pennsylvania, **KENNETH CHRISTOPHER MCGHEE** ordered that SCD members commit a retaliatory homicide against members of the rival Naptown Riders OMG and Outcast OMG.

ff. On approximately August 13, 2019, **MARVIE D. GARDNER**, after hearing of the murder of SCD member Curtiss Meeks a/k/a “Chickenhawk,” in Penn Hills, Pennsylvania, recorded and broadcast a message to all SCD members over the Marco Polo communication App. In this message, he stated that “Yall listen like you ain’t never motherfucking listened before. It’s on. Level One. We’re going to get these motherfuckers...you understand

me? We're going to get these motherfuckers that killed my motherfucking brother. Listen, man. These motherfuckers, they took our little brother, Chickenhawk, in Pittsburgh." **GARDNER** then posted a picture of a green traffic light, which is referred to by SCD as "Shoot to Kill/Kill on sight." At the time of issuing this order **GARDNER** was the National Vice President of SCD.

gg. After receiving this directive, **DOUGLAS SHERMAN BLOWERS**, as President of the Gary, Indiana chapter, called in SCD members and demanded that they carry out **MCGHEE**'s orders.

hh. On January 31, 2020, **DANIEL RICHARD SPANLEY** sold approximately 15 grams of cocaine to an ATF informant for \$700 in Hobart, Indiana.

ii. On an unknown date in late 2019 or 2020, members of the SCD approached members of the Steel City Car Club and told them that they cannot be an independent club in Gary, Indiana, and need to wear an SCD support patch. They would need to buy these at \$15 a patch, and then pay monthly fees. On February 8, 2020, **DOUGLAS SHERMAN BLOWERS** and other members of the SCD approached members of the Steel City Car Club at Roxxy's Bar in Gary, Indiana to ask the President if the club had

made a decision on whether or not to wear the SCD patch. The president of the car club said that the answer was no. The president and other members of the car club were then beaten by SCD members, who were taking directions from **BLOWERS**. The SCD members also ripped off and stole the Steel City Car Club patches from the members who were present.

jj. On February 11, 2020, **DANIEL RICHARD SPANLEY** sold two firearms for \$600 to an ATF informant in Hobart, Indiana.

kk. On June 21, 2020, **DANIEL RICHARD SPANLEY** possessed a firearm as a convicted felon in Gary, Indiana.

ll. On an unknown date during the course of the conspiracy **DOUGLAS SHERMAN BLOWERS** organized a group of SCD members from the Gary, Indiana, Battle Creek, Michigan, Kalamazoo, Michigan, and St. Joseph, Michigan Chapters to go to the South Bend, Indiana clubhouse of the rival Naptown Riders Motorcycle Club to seize their “cuts.” The Naptown Riders had been warned that the SCD members were coming and were not present when they arrived.

mm. On an unknown date during the course of the conspiracy **DOUGLAS SHERMAN BLOWERS** ordered a fellow SCD member to take the patch of a member of the Braveheart Motorcycle Club for being

disrespectful.

nn. On an unknown date during the course of the conspiracy an individual accidentally backed into **KENNETH CHRISTOPHER MCGHEE**'s automobile in a parking lot. **DOUGLAS SHERMAN BLOWERS** ordered fellow members of the SCD to beat up the individual who had accidentally done so.

oo. On July 17, 2020, **DANIEL RICHARD SPANLEY** possessed a firearm as a convicted felon in Hobart, Indiana.

pp. On July 19, 2020, **JAMES ULRICH RICHARDSON** possessed a firearm as a convicted felon in Gary, Indiana.

qq. On August 10, 2020, **JAMES ULRICH RICHARDSON** possessed with the intent to distribute approximately five kilograms of cocaine in El Reno, Oklahoma.

rr. On June 26, 2021, the SCD held their annual Cabaret in Gary, Indiana. At this event an incident was discussed that the Wheels of Soul MC and Bandidos MC members had approached a SCD member and told him that SCD members were not allowed to wear their cuts in Mississippi. The member called a ranking SCD member who told him to "stand down." **KENNETH CHRISTOPHER McGHEE** stated to "take care of that (the

member who said to stand down). I want his ass...I want his ass, he out." He then stated that "there ain't no fucking talking no more. If they do something, do what the fuck you got to do."

ss. The SCD members present then discussed the fact that the Bandidos MC and the Hells Angels MC were joining forces with the Hell's Lovers. **MICHAEL CASTRO RIVERA** then stated that "this is the point. This is what I was told forty years ago, and I stand on it. You stand up for them motherfucking rags you got on your back. If you can't handle it, you better call some motherfucker because some of these motherfuckers will go. Some of you motherfuckers don't care about killing a motherfucker or doing something to a motherfucker, you can trust and believe that. So, you motherfuckers that got it in you, you don't have to ask permission. You understand? Because if they catch you out there on your bike by yourself, I am going to tell you what they like doing. Shooting you off...you motherfucking bike."

tt. **KENNETH CHRISTOPHER MCGHEE** then disagreed, stating "No they don't, Mike. They don't do too much shooting. They don't fight like we fight." He continued, "They really scared of us, they don't know how we coming and who is on our side." He then ordered that "you all better step up

to the plate, man. Step up to the motherfucking plate.” He explained that “I would rather be caught with a gun than without a gun.”

uu. **MICHAEL CASTRO RIVERA** then stated that “we might send a motherfucker in your region and when we send him there. I sent one motherfucker to take care of, to see what the fuck is going on with these other clubs and he ran right into it. You understand that? Because that’s what he do. Well, a motherfucker told him to stand down. Well, they shouldn’t have told him that because you all wouldn’t have had no problems. Talking about we don’t want no blood shit. Well, what the fuck?” **RIVERA** continued that “back in the day, we use to take over shit. Everywhere we went, a bar, another club, we take over. We run this motherfucker.” He explained that “shit is jumping off on the East Coast, in case you didn’t know. It’s jumping off in Texas he is taking care of....[SIN CITY DECIPLINE 1] Stand up. We got this motherfucker right here dictating Sin City policy down in the State of Texas because we don’t have anybody strong enough down there because they want to be friends.”

vv. **KENNETH CHRISTOPHER McGHEE** again addressed the group, asking “who they going to call? You doing your job. If they call up here you know what, if they call up here with that bullshit, fine them again

and take their center patch. And you know what, you go and you whoop their ass. When they turn their colors in, beat they ass. I fucking mean it. If you all can't do it, I will send some Enforcers down there and they will beat your ass. That's the bottom line, I mean that." He further stated that "It's ass-kicking time. Who in here is in a street gang up in here? Do you all let it slide or what? You know what because that's how it's going to be. Because all you all in a street gang and it ain't no different. It ain't no fucking different. They going to get they ass whooped."

xx. **DOUGLAS SHERMAN BLOWERS** then addressed the group, stating "Old Man [**KENNETH CHRISTOPHER McGHEE**] says as of today nobody is to fuck with the Hell's Lovers, the motherfucking Outcast, we are good with the Wheels of Soul, and we are good with the Chosen Few. No one is to fuck with the Hell's Lovers or the Outcast anywhere in the country. In fact, it's going to be bad. That means we are going to war with them is what he said, Mike."

xx. **MICHAEL CASTRO RIVERA** then again addressed the group, stating "for you guys that have the rivals at your city, stay away from the motherfuckers. If they cross, do something to them. If you need some help, just call. Call IB. he will send a mother fucker down there. **RICHARD**

WHITE then stated that “I will come myself.” When asked what was going on with the rival Naptown Riders, **RIVERA** responded that “if you come in the Mother Chapter, you will see that banner upside down, them colors.”

yy. On September 12, 2021, at approximately 1:00 a.m., approximately fifty members of the SCD, including **KENNETH CHRISTOPHER McGHEE**, and **MICHAEL CASTRO RIVERA**, forcibly entered the Moville Groundshaker’s Motorcycle Clubhouse in Kokomo, Indiana, and demanded to speak with the founder of the club. The SCD members, who were armed with handguns and AR-15 style rifles, told the founder that the SCD were taking over control of Kokomo, and that the Moville Groundshaker’s needed to “patch over” and become a support club of the SCD. Members of the SCD, some of whom wore masks, formed a perimeter around the clubhouse, not letting anyone leave the area. In addition, individuals inside the clubhouse were not allowed to access their telephones, to prevent them from calling the police. The founder of Moville Groundshakers told the SCD that some members do not want to “patch over” to SCD. The SCD members told the founder of Moville Groundshakers that if they do not patch over by September 17, 2021, there would be retaliation. During the course of this event, one individual was beaten up by SCD members for not following

orders. In addition, at least one SCD put a gun to someone's head in a threatening manner.

zz. On September 18, 2021, a National Meeting was held in a Holiday Inn hotel in Merrillville, Indiana. During the course of this meeting **KENNETH CHRISTOPHER McGHEE** instructed SCD that members need to handle their business if they have issues. They are not to call the Mother Chapter in Gary, Indiana anymore to ask what to do. He stated that if the National Enforcers cannot handle their job, they need to call **RICHARD WHITE**. **McGHEE** stated that one cannot simply quit the club anymore. If they want to quit, they need to pay \$10,000.

aaa. **BERNARD SMITH** then addressed the group, stating that if a SCD member does not pay the \$10,000 fee for leaving the SCD, his chapter is responsible for the money. **SMITH** also bragged that he has been in SCD for over 40 years.

bbb. **KENNETH CHRISTOPHER McGHEE** again addressed the group, stating that every person in the room was handpicked for their position. The SCD is a 1% club, and everyone in the room is a one percenter. **McGHEE** said that the reason why no one ever messed with SCD is because of the individuals. He stated that "if you do the crime, you do the goddamn

time...ever heard of RICO?" He urged the need to make the younger members "step up to the plate" for the Nation, as "we're at war every fucking day." He continued that "we got some soldiers, every chapter has some hitters...they're the ones that scare others."

ccc. **HERMAN TROY JEFFERSON** then spoke, stating that "if your chapters aren't moving the right way, then you got the wrong dudes in position. Simple as that." **JEFFERSON** advised all of the National and Regional leaders that they, along with **JEFFERSON**, are the new guys who need to take charge. He stated that the old guys created the club and made it what it is today. In saying this, he gestured on the stage towards **KENNETH CHRISTOPHER McGHEE**, **MICHAEL CASTRO RIVERA**, **BERNARD SMITH**, **ROGER LEE ERVIN BURTON**, and others. **JEFFERSON** expressed anger that some National members were absent, stating "I'm gangster. I'm going to get mine...put me in a situation and I'm going to produce." He continued, "I'm following rules. I follow dictatorship. I'm willing. I'm submissive. I'm humble, and I know the motherfucking business." He explained that "this is an outlaw club" and "I'm an outlaw...this is what I do for a living."

ddd. Towards the end of the meeting **MICHAEL CASTRO RIVERA**

stated that "I made the decision not to have all the National Enforcers here...I talks to Sonny (**KENNETH CHRISTOPHER McGHEE**), I talked to Flirt (**BERNARD SMITH**). We made the decision."

Notice of Enhanced Sentencing

26. On or about December 9, 2010, in the Northern District of Indiana, **RONNIE ERVIN MAJOR** and **ANTOINE JERMELL GATES** knowingly and intentionally killed Jocelyn Blair in violation of Indiana Code Sections 35-42-1-1 and 35-41-2-4, while committing and attempting to commit Criminal Organization Activity, as defined in Indiana Code Section 35-49-9-3, in violation of Indiana Code Section 35-50-2-9(b)(1)(I);

27. On or about December 9, 2010, in the Northern District of Indiana, **RONNIE ERVIN MAJOR** knowingly and intentionally killed Jocelyn Blair in violation of Indiana Code Sections 35-42-1-1 and 35-41-2-4, by hiring **ANTOINE JERMELL GATES** to kill Jocelyn Blair, in violation of Indiana Code Section 35-50-2-9(b)(5).

28. On or about December 9, 2010, in the Northern District of Indiana, **ANTOINE JERMELL GATES** knowingly and intentionally killed Jocelyn Blair in violation of Indiana Code Sections 35-42-1-1 and 35-41-2-4, (c) after being hired to kill Jocelyn Blair, in violation of Indiana Code Section 35-50-2-9(b)(4).

29. On or about December 9, 2010, in the Northern District of Indiana, **RONNIE ERVIN MAJOR** knowingly and intentionally killed Jocelyn Blair

in violation of Indiana Code Sections 35-42-1-1 and 35-41-2-4, knowing that Jocelyn Blair was listed by the State of Indiana and known by the defendant to be a witness against the defendant and the defendant committed the murder with the intent to prevent Jocelyn Blair from testifying, in violation of Indiana Code Section 35-50-2-9(b)(14).

All in violation of Title 18, United States Code, Section 1962(d).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

**(Conspiracy to Possess with Intent to Distribute
and Distribute Cocaine, Marijuana, and Heroin)**

Beginning on a date unknown to the Grand Jury, but at least as of in or about 2009, and continuing through on or about the date of this Superseding Indictment, in the Northern District of Indiana and elsewhere, the defendants,

**RONNIE ERVIN MAJOR a/k/a "Black,"
ANTOINE JERMELL GATES aka "Twan,"
KENNETH CHRISTOPHER MCGHEE a/k/a "Sonny," "Angel,"
MICHAEL CASTRO RIVERA a/k/a "Puerto Rican Mike,"
DOUGLAS SHERMAN BLOWERS a/k/a "Proffit,"
DANIEL RICHARD SPANLEY a/k/a "Tattoo,"
ROGER LEE ERVIN BURTON a/k/a "Bo,"
JAMES ULRICH RICHARDSON a/k/a "Little Rick,"
RICHARD WHITE a/k/a "Ignorant Bastard" "I.B.,"
BRANDON ROMAND PARKS a/k/a "Baywatch,"
HERMAN TROY JEFFERSON a/k/a "G-Rilla,"
DAVID LAGRANT GUY a/k/a "Fly Guy"
JESSIE DONALD WILLIS a/k/a "Chip,"
MARVIE D. GARDNER a/k/a "Widowmaker,"
BERNARD SMITH a/k/a "Flirt," "Preacher,"
and
GREGORY PATRICK WELDON a/k/a "Sugar Bear,"**

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with one another and others known and unknown to the grand jury, to commit the following offense against the United States: to

knowingly and intentionally possess with intent to distribute and distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, a quantity of marijuana, a Schedule I controlled substance, and a quantity of heroin, a Schedule I controlled substance;

All in violation of Title 21, United States Code, Section 846.

THE GRAND JURY FURTHER CHARGES:

COUNT 3
(Murder for Hire)

On or about December 19, 2010, in the Northern District of Indiana, the defendants,

RONNIE ERVIN MAJOR a/k/a "Black"
and
ANTOINE JERMELL GATES a/k/a "Twan,"

used and caused another to use a facility of interstate commerce, with the intent that the murder of Jocelyn Blair be committed in violation of the laws of the state of Indiana, as consideration for a promise and agreement to pay a thing of pecuniary value, and which resulted in Blair's death;

In violation of Title 18, United States Code, Section 1958(a) and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 4

(Murder Resulting From the Use of a Firearm During and in Relation to a Crime of Violence)

On or about December 19, 2010, in the Northern District of Indiana,

**RONNIE ERVIN MAJOR a/k/a "Black"
and
ANTOINE JERMELL GATES a/k/a "Twan,"**

defendants herein, did use a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, which is the crime of Murder for Hire, as charged in Count 3 of this Superseding Indictment, and in the course of this violation, defendants caused the death of Jocelyn Blair through the use of a firearm, such killing being murder as defined in Title 18, United States Code, § 1111, in that it was committed with malice aforethought, and unlawfully, willfully, deliberately, maliciously and with premeditation, and committed in the perpetration of a murder for hire;

In violation of Title 18, United States Code, Sections 924(c) and (j), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 5

On or about July 8, 2019, in the Northern District of Indiana and the Western District of Kentucky,

**DANIEL RICHARD SPANLEY a/k/a "Tattoo"
and
GREGORY PATRICK WELDON a/k/a "Sugar Bear,"**

defendants herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 6

On or about November 7, 2019, in the Northern District of Indiana,

GREGORY PATRICK WELDON a/k/a “Sugar Bear,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 7

On or about December 13, 2019, in the Northern District of Indiana,

GREGORY PATRICK WELDON a/k/a “Sugar Bear,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 8

On or about January 31, 2020, in the Northern District of Indiana,

DANIEL RICHARD SPANLEY a/k/a “Tattoo,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 9

On or about February 11, 2020, in the Northern District of Indiana,

DANIEL RICHARD SPANLEY a/k/a "Tattoo,"

defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, and the firearms were in and affecting commerce;

In violation of Title 18, United States Code, Section 922(g)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 10

On or about July 17, 2020, in the Northern District of Indiana,

DANIEL RICHARD SPANLEY a/k/a "Tattoo,"

defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, and the firearm was in and affecting commerce;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

COUNT 1

1. The allegations contained in Count 1 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of any defendant's conviction under Count 1 of this Superseding Indictment.

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1962, the defendants,

RONNIE ERVIN MAJOR a/k/a "Black,"
KENNETH CHRISTOPHER MCGHEE a/k/a "Sonny," "Angel,"
ANTOINE JERMELL GATES a/k/a "Twan,"
MICHAEL CASTRO RIVERA a/k/a "Puerto Rican Mike,"
DOUGLAS SHERMAN BLOWERS a/k/a "Proffit,"
DANIEL RICHARD SPANLEY a/k/a "Tattoo,"
ROGER LEE ERVIN BURTON a/k/a "Bo,"
JAMES ULRICH RICHARDSON a/k/a "Little Rick,"
RICHARD WHITE a/k/a "Ignorant Bastard" "I.B.,"
BRANDON ROMAND PARKS a/k/a "Baywatch,"
HERMAN TROY JEFFERSON a/k/a "G-Rilla,"
DAVID LAGRANT GUY a/k/a "Fly Guy"
JESSIE DONALD WILLIS a/k/a "Chip,"
MARVIE D. GARDNER a/k/a "Widowmaker,"

and
BERNARD SMITH a/k/a "Flirt," "Preacher"

shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 1963:

- a. any interest the defendant(s) acquired or maintained in violation of section 1962;
- b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant(s) established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and
- c. any property constituting, or derived from, any proceeds which the defendant(s) obtained, directly or indirectly, from racketeering activity in violation of 1962.

3. Upon conviction of an offense set forth in this Superseding Indictment, the government will seek a money judgment in the amount of proceeds received for the defendant's participation in the alleged scheme.

4. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 1963(m).

COUNT 2

1. The allegations of Count 2 of the Superseding Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of an offense in violation of Title 21, United States Code, Section 846, alleged in Count Two of the Superseding Indictment, defendants herein,

**RONNIE ERVIN MAJOR a/k/a "Black,"
KENNETH CHRISTOPHER MCGHEE a/k/a "Sonny," "Angel,"
MICHAEL CASTRO RIVERA a/k/a "Puerto Rican Mike,"
DOUGLAS SHERMAN BLOWERS a/k/a "Proffit,"
DANIEL RICHARD SPANLEY a/k/a "Tattoo,"
ROGER LEE ERVIN BURTON a/k/a "Bo,"**

**JAMES ULRICH RICHARDSON a/k/a "Little Rick,"
RICHARD WHITE a/k/a "Ignorant Bastard" "I.B.,"
BRANDON ROMAND PARKS a/k/a "Baywatch,"
HERMAN TROY JEFFERSON a/k/a "G-Rilla,"
DAVID LAGRANT GUY a/k/a "Fly Guy"
JESSIE DONALD WILLIS a/k/a "Chip,"
MARVIE D. GARDNER a/k/a "Widowmaker,"
BERNARD SMITH a/k/a "Flirt," "Preacher,"
and
GREGORY PATRICK WELDON a/k/a "Sugar Bear,"**

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

3. Upon conviction of an offense set forth in in this Superseding Indictment, the government will seek a money judgment in the amount of proceeds received for the defendant's participation in the alleged scheme.

4. If any of the property described above, as a result of any act or omission of any of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

COUNT 3

1. The allegations contained in Count 3 of the Superseding Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1958, the defendants, **RONNIE ERVIN MAJOR a/k/a "Black" and ANTOINE JERMELL GATES a/k/a "Twan"**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

3. Upon conviction of an offense set forth in in this Superseding

Indictment, the government will seek a money judgment in the amount of proceeds received for the defendant's participation in the alleged scheme.

4. If any of the property described above, as a result of any act or omission of any of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

COUNT 4

1. The allegations contained in Count 4 of the Superseding Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d), and Title 28,

United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 924(c) or (j) alleged in Count Four of the Superseding Indictment, the defendants, **RONNIE ERVIN MAJOR a/k/a "Black"** and **ANTOINE JERMELL GATES a/k/a "Twan,"** shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any and all firearms, firearm magazines, firearm accessories, and ammunition involved in the commission of the offense.

COUNTS 5, 6, 7 and 8

1. The allegations contained in Counts 5, 6, 7 and 8 of this Superseding Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

2. Upon conviction of an offense in violation of Title 21 United States Code, Section 841 alleged in Counts 5 or 8 of this Superseding Indictment, the defendant, **DANIEL RICHARD SPANLEY a/k/a "Tattoo,"** shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any

proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

3. Upon conviction of an offense in violation of Title 21 United States Code, Section 841 alleged in Counts 5, 6, or 7 of this Superseding Indictment, the defendant, **GREGORY PATRICK WELDON a/k/a "Sugar Bear"**, shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

4. Upon conviction of an offense set forth in in this Superseding Indictment, the government will seek a money judgment in the amount of proceeds received for the defendant's participation in the alleged scheme.

5. If any of the property described above, as a result of any act or omission of any of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

COUNTS 9 and 10

1. The allegations contained in Counts 9 and 10 of the Superseding Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g)(1) alleged in Counts 9 or 10 of the Superseding Indictment, the defendant, **DANIEL RICHARD SPANLEY a/k/a “Tattoo,”** shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any and all firearms, firearm magazines, firearm accessories, and ammunition involved in the commission of the offense.

All pursuant to Title 18, United States Code, Section 1963, Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

/s/ Foreperson
FOREPERSON

CLIFFORD D. JOHNSON
UNITED STATES ATTORNEY

By: /s/ David J. Nozick
David J. Nozick
Assistant United States Attorney

By: /s/ Michael J. Toth
Michael J. Toth
Assistant United States Attorney

By: /s/ Thomas R. Mahoney
Thomas R. Mahoney
Assistant United States Attorney